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June 7, 2021

VIA ECF

Honorable Jesse M. Furman, U.S.D.J.
United States District Court
Southern District of New York
40 Centre Street, Room 2202
New York, NY 10007

Re: *David Lopez v. Nelson Management Group, Ltd., et al.*,
Case No. 1:21-cv-00865 (JMF)

Dear Judge Furman:

This firm represents the Defendants in the above-referenced action. Pursuant to Sections 1.A and 1.E of Your Honor's Individual Rules and Practices, we respectfully seek, on consent, an adjournment of the initial pretrial conference in this matter until Wednesday, August 11, 2021 at 4:30 p.m., or another date and time as soon thereafter as may be convenient for this Court.

This is the second request by any party for an adjournment of the initial pretrial conference, originally scheduled for May 5, 2021. *See* Dkt. 5. Pursuant to this Court's Order scheduling the initial conference, the parties were directed to participate in a mediation conference to be held no later than two weeks before the initial pretrial conference, although a conflict prevented the parties from participating in mediation within that schedule. Since the prior application, the parties have requested referral to the Southern District's court-annexed Mediation Program, a mediator has been assigned and the parties have agreed to schedule a mediation conference for July 22, 2021 at 10:00 am.

Accordingly, to permit the parties to attempt to mediate their dispute before commencing formal discovery, and in light of this Court's Order, entered today, *see* Dkt. 22, advising that the Court will not hold the initial conference as rescheduled for June 16, 2021 and will instead hold the initial conference by telephone, albeit perhaps at a different time, Defendants request that the Court adjourn any initial pretrial conference through at least Wednesday, August 11, 2021. Defendants also request that the other interim deadlines set forth in this Court's February 1 Order, including the deadlines to hold the Rule 16 conference and submit the parties' joint letter, be extended commensurate with any rescheduled initial pretrial conference date.

We have conferred today with counsel for Plaintiff, who consents to this application.

CLIFTON BUDD & DEMARIA, LLP

Hon. Jesse M. Furman, U.S.D.J.

June 7, 2021

Page 2

We thank the Court for its consideration of this request.

Respectfully Submitted,

CLIFTON BUDD & DEMARIA, LLP

Attorneys for Defendants

By: 
Stephen P. Fischl

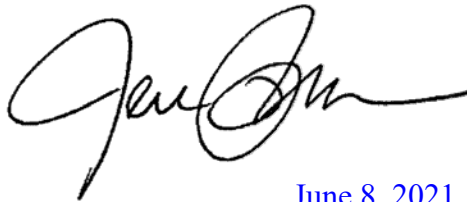
cc: **VIA ECF**

Honorable Stewart D. Aaron
United States Magistrate Judge
United States District Court
Southern District of New York

ABDUL HASSAN LAW GROUP, PLLC

Attorneys for the Plaintiffs

The initial pretrial conference, currently scheduled for June 16, 2021, is hereby **RESCHEDULED** for **August 11, 2021, at 4:30 p.m.** The Clerk of Court is directed to terminate ECF No. 23. **SO ORDERED.**



June 8, 2021